

BEFORE THE
FEDERAL ELECTION COMMISSION

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COMMISSION

2014 NOV -3 AM 10:05

American Democracy Legal Fund
455 Massachusetts Avenue, N.W.
Washington, DC 20001

Complainant,

v.

OFFICE OF GENERAL
COUNSEL

MUR 6888
Supplement

Republican National Committee
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Respondents.

SUPPLEMENTAL COMPLAINT

The American Democracy Legal Fund files this complaint with the Federal Election Commission (the "FEC" or "Commission") under 2 U.S.C. § 437g(a)(1) against the above named respondents (collectively "Respondents") for numerous violations of the Federal Election Campaign Act of 1971, as amended (the "Act"). This complaint supplements a previous complaint submitted to the Commission on October 14, 2014, regarding millions of dollars in illegal "coordinated communications" facilitated through the ongoing, real-time exchange of non-public strategic campaign and party data with groups making purportedly "independent" expenditures (the "Complaint").

As detailed in the Complaint, the RNC has created a for-profit entity, the Data Trust, charged with maintaining and sharing a vast database of information about hundreds of millions of Americans for Republican parties and campaigns. The Data Trust not only operates the RNC's voter file, however, but also provides the same data to American Crossroads, Crossroads

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GPS, and numerous other outside organizations that are legally required to operate independently of the Republican Party and its candidates. Moreover, the RNC and the Data Trust have recently partnered with i360, a data management firm that supplies voter information to other conservative organizations, including the Koch brothers' Americans for Prosperity ("AFP"), one of the largest outside organizations supporting the Republican Party.

The Data Trust and i360 have implemented technical upgrades that allow the RNC, Republican campaigns, and any outside groups subscribing to either the Data Trust's or i360's voter database to not only "access voter information anytime . . . but update it instantly, so others viewing the voter lists can see the information immediately."¹ According to the terms of Data Trust/i360 partnership,

Clients of either The Data Trust or i360 can improve the data shared with all clients. For example, if a client of either company conducting voter outreach identifies a voter attribute or preference, clients of the other organization will benefit from that information. As a result, conservative groups and campaigns will have more information about voters at their disposal for their own activities than ever before.²

This move to a real time exchange of non-public, strategically material data through a common vendor constitutes "coordination" under the Act, and means that the purported "independent expenditures" of American Crossroads, Crossroads GPS, AFP and other outside organizations are in fact, excessive, illegal, in-kind contributions to the RNC and other Republican parties and campaigns uploading their information to the Data Trust and i360..

Reports filed with the Commission have revealed the identities of some of the Republican state party committees and federal candidate committees that are using i360's voter database services, and, therefore, passing on crucial, nonpublic voter information to i360's other

¹ Alex Roarty, "Did the GOP Just Take a Big Leap Forward in Data?" *National Journal* (July 14, 2014), available at <http://www.nationaljournal.com/politics/did-the-gop-just-take-a-big-leap-forward-in-data-20140714>.

² GOP Data Trust, "Data Trust and i360 Announce Historic Data Sharing Partnership" (Aug. 28, 2014), available at <http://www.gopdatatrust.com/blog/?p=95>.

“independent” clients, entities that are legally prohibited from coordinating with the party and candidate committees. The attached schedule of disbursements disclosed on reports filed with the Commission proves that at least 25 Republican candidate committees are using i360 as a vendor. These candidates are paying i360 for such services as “voter contact database subscriptions,” “list acquisition,” “canvassing subscriptions” and “data management monthly canvassing apps.” Moreover, news reports indicate that at least three Republican state central party committees are using i360 for similar voter database and canvassing services.³ These Republican state party committees and federal candidate committees are identified above as Respondents to this Supplemental Complaint.

The Commission’s regulations explain that an expenditure for a communication will be considered an in-kind contribution to a campaign or party if it is (1) paid for by an entity other than the party, candidate or candidate’s campaign; (2) meets certain content standards, including by being a public communication that expressly advocates the election or defeat of a clearly identified candidate; and (3) meets certain conduct standards, including the payor and the candidate, the candidate’s opponent, or a political party using a common vendor.⁴ The “common vendor” standard is satisfied if the payor uses a particular vendor to create, produce or distribute a communication;⁵ when that vendor has provided certain specific services to the candidate identified in the communication, that candidate’s opponent, or a political party during the previous 120 days, including “identifying voters or developing lists”;⁶ and the vendor then uses or conveys to the payor material information about the candidate’s or the political party’s plans,

³ Jon Ward, “The Behind the Scenes Story of the RNC’s Quest for Data Supremacy,” HuffingtonPost.com (Apr. 18, 2014), available at http://www.huffingtonpost.com/2014/04/18/rnc-data_n_5153927.html.

⁴ See 11 C.F.R. §§ 109.21(a), (c)(3), (d)(4).

⁵ See *id.* § 109.21(d)(4)(i).

⁶ See *id.* § 109.21(d)(4)(ii)(G) (emphasis added).

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projects, activities, or needs, or information used previously in providing services to the candidate or the political party.⁷

Here, the disbursements to i360 by the state party committees and candidate committees prove that i360 is serving as a “common vendor” for the committees and for outside groups that are required to remain independent of those committees. Moreover, public statements made by AFP, the RNC and others show that i360’s technology *automatically* passes material information about the committees’ plans and activities to any and all outside groups that also subscribe to i360, down to the very issues the committees are discussing with a given voter at a given time.⁸

Accordingly, each and every time another group pays for a public communication that expressly advocates the election or defeat of any of these candidates, or mentions these candidates, their opponents, or the Democratic or Republican parties in a communication airing within the relevant candidate’s or party’s jurisdiction within 120 days of an election, all three components of the Commission’s “common vendor” test for coordinated communications are satisfied. The payments for the communications are therefore excessive, prohibited contributions to the candidates and state parties. For example, AFP has made nearly \$350,000 in supposedly “independent” expenditures opposing U.S. Senator Mark Pryor.⁹ Senator Pryor is the opponent of Respondents Tom Cotton and Cotton for Senate, which is a client of i360. Similarly, AFP has made over \$100,000 in expenditures opposing U.S. Senator Mark Begich.¹⁰ Senator Begich is the opponent of Respondents Dan Sullivan and Sullivan for US Senate,

⁷ See *id.* §§ 109.21(d)(4)(iii)(A), (B).

⁸ See Complaint at 3-7.

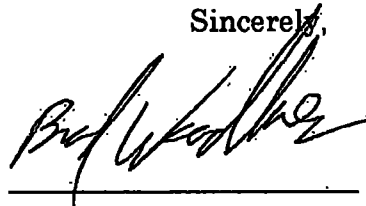
⁹ See Americans for Prosperity 24-Hour Independent Expenditure Report (Oct. 25, 2014), available at <http://docquery.fec.gov/pdf/071/14952549071/14952549071.pdf>.

¹⁰ See Americans for Prosperity 24-Hour Independent Expenditure Report (Oct. 25, 2014), available at <http://docquery.fec.gov/pdf/089/14952549089/14952549089.pdf>.

another i360 client. It appears these expenditures constitute coordinated communications and excessive contributions under the Commission's "common vendor" rule.

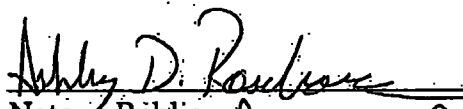
We respectfully request that the Commission immediately investigate these newly named Respondents to determine their involvement in what now appears to be a massive scheme to flaunt the Commission's ban on coordinated communications. The Commission should determine the extent to which these new Respondents have accepted excessive contributions in the form such coordinated communications, enjoin Respondents from further violations of the Act; and assign the maximum fines permitted by law.

Sincerely,



Brad Woodhouse, Treasurer

SUBSCRIBED AND SWORN to before me this 28 day of October, 2014.


Notary Public Ashley D. Roseboro

My Commission Expires:

February 28, 2019



Republican Candidate Committee Disbursements to I360

2013-14 Election Cycle

Name of Republican Candidate Committee	FEC Committee ID	Date of Disbursement	Amount of Disbursement	Reprint	Reported Purpose of Disbursement	URL to View Disbursement on Committee's Reports Filed with the Commission
ANDREW WALTER FOR CONGRESS	C00543280	3/7/2014	\$600.00	I360	VOTER FILE SOFTWARE	http://docquery.fec.gov/cgi-bin/fecdmg?14960773793
ANDREW WALTER FOR CONGRESS	C00543280	4/1/2014	\$350.00	I360	VOTER FILE SOFTWARE	http://docquery.fec.gov/cgi-bin/fecdmg?14941838491
ANDREW WALTER FOR CONGRESS	C00543280	7/2/2014	\$350.00	I360	VOTER FILE SOFTWARE	http://docquery.fec.gov/cgi-bin/fecdmg?14950022820
ANDREW WALTER FOR CONGRESS	C00543280	7/2/2014	\$350.00	I360	VOTER FILE SOFTWARE	http://docquery.fec.gov/cgi-bin/fecdmg?14950022819
BEN SASSE FOR US SENATE INC	C00547976	10/16/2013	\$8,233.81	I360, LLC	LIST RENTAL EXPENSE	http://docquery.fec.gov/cgi-bin/fecdmg?14020021982
BEN SASSE FOR US SENATE INC	C00547976	4/2/2014	\$300.00	I360, LLC	DATA SUBSCRIPTION	http://docquery.fec.gov/cgi-bin/fecdmg?14020340270
BEN SASSE FOR US SENATE INC	C00547976	4/30/2014	\$300.00	I360, LLC	SUBSCRIPTION EXPENSE	http://docquery.fec.gov/cgi-bin/fecdmg?14020460480
BOB GOODLATTE FOR CONGRESS COMMITTEE	C00257956	4/16/2014	\$850.00	I360	VOTER CONTACT DATA BASE SUBSCRIPTION	http://docquery.fec.gov/cgi-bin/fecdmg?14961231396
BOB GOODLATTE FOR CONGRESS COMMITTEE	C00257956	5/15/2014	\$350.00	I360	VOTER CONTACT DATA BASE SUBSCRIPTION	http://docquery.fec.gov/cgi-bin/fecdmg?14961231407
BOB GOODLATTE FOR CONGRESS COMMITTEE	C00257956	6/12/2014	\$350.00	I360	VOTER CONTACT DATA BASE SUBSCRIPTION	http://docquery.fec.gov/cgi-bin/fecdmg?14978125882
BOBBY SCHILLING FOR CONGRESS	C00458354	4/1/2014	\$350.00	I360, LLC	COMPUTER SOFTWARE	http://docquery.fec.gov/cgi-bin/fecdmg?14961578901
BOBBY SCHILLING FOR CONGRESS	C00458354	5/27/2014	\$350.00	I360, LLC	COMPUTER SOFTWARE	http://docquery.fec.gov/cgi-bin/fecdmg?14961578917
CARL DEMAIO FOR CONGRESS	C00545384	1/8/2014	\$2,282.96	I360	E-MARKETING	http://docquery.fec.gov/cgi-bin/fecdmg?14960757940
CARL DEMAIO FOR CONGRESS	C00545384	1/20/2014	\$1,590.06	I360	E-MARKETING	http://docquery.fec.gov/cgi-bin/fecdmg?14960757941
CARL DEMAIO FOR CONGRESS	C00545384	2/5/2014	\$2,801.38	I360	E-MARKETING	http://docquery.fec.gov/cgi-bin/fecdmg?14960757944
CARL DEMAIO FOR CONGRESS	C00545384	3/1/2014	\$300.00	I360	E-MARKETING	http://docquery.fec.gov/cgi-bin/fecdmg?14960757950
CARL DEMAIO FOR CONGRESS	C00545384	4/9/2014	\$300.00	I360	E-MARKETING	http://docquery.fec.gov/cgi-bin/fecdmg?14961203606
CARL DEMAIO FOR CONGRESS	C00545384	5/7/2014	\$300.00	I360	E-MARKETING	http://docquery.fec.gov/cgi-bin/fecdmg?14961203629
CARL DEMAIO FOR CONGRESS	C00545384	5/15/2014	\$732.31	I360	E-MARKETING	http://docquery.fec.gov/cgi-bin/fecdmg?14961612086
CARL DEMAIO FOR CONGRESS	C00545384	6/8/2014	\$300.00	I360	E-MARKETING	http://docquery.fec.gov/cgi-bin/fecdmg?14961612109
CHENEY FOR WYOMING	C00547141	10/1/2013	\$950.00	I360	DATABASE MANAGEMENT	http://docquery.fec.gov/cgi-bin/fecdmg?14020110357
CHENEY FOR WYOMING	C00547141	10/30/2013	\$350.00	I360	WEB SERVICE	http://docquery.fec.gov/cgi-bin/fecdmg?14020110357
CHENEY FOR WYOMING	C00547141	12/29/2013	\$350.00	I360	WEB SERVICE	http://docquery.fec.gov/cgi-bin/fecdmg?14020110358
CHENEY FOR WYOMING	C00547141	1/8/2014	\$525.00	I360	WEB SERVICE	http://docquery.fec.gov/cgi-bin/fecdmg?14020181189
COTTON FOR SENATE	C00499988	2/12/2014	\$250.00	I360, LLC	DATA SUBSCRIPTION	http://docquery.fec.gov/cgi-bin/fecdmg?14020352222
COTTON FOR SENATE	C00499988	4/4/2014	\$500.00	I360, LLC	DATA SUBSCRIPTION	http://docquery.fec.gov/cgi-bin/fecdmg?14020352222
COTTON FOR SENATE	C00499988	5/12/2014	\$250.00	I360, LLC	COMMUNICATIONS CONSULTING	http://docquery.fec.gov/cgi-bin/fecdmg?14020544073
COTTON FOR SENATE	C00499988	6/1/2014	\$250.00	I360, LLC	COMMUNICATIONS CONSULTING	http://docquery.fec.gov/cgi-bin/fecdmg?14020544073
DOUG OSE FOR CONGRESS	C00444836	2/20/2014	\$850.00	I360, LLC	WEBSITE DEVELOPMENT	http://docquery.fec.gov/cgi-bin/fecdmg?14941839548
DOUG OSE FOR CONGRESS	C00444836	3/14/2014	\$350.00	I360, LLC	WEBSITE MAINTENANCE	http://docquery.fec.gov/cgi-bin/fecdmg?14941839566
DOUG OSE FOR CONGRESS	C00444836	4/1/2014	\$350.00	I360, LLC	WEBSITE MAINTENANCE	http://docquery.fec.gov/cgi-bin/fecdmg?14941839900
DOUG OSE FOR CONGRESS	C00444836	5/30/2014	\$350.00	I360, LLC	WEBSITE MAINTENANCE	http://docquery.fec.gov/cgi-bin/fecdmg?14961636317
DOUG OSE FOR CONGRESS	C00444836	6/9/2014	\$350.00	I360, LLC	WEBSITE MAINTENANCE	http://docquery.fec.gov/cgi-bin/fecdmg?14961636327
ELISE FOR CONGRESS	C00547893	4/4/2014	\$1,200.00	I360, LLC	SUBSCRIPTIONS	http://docquery.fec.gov/cgi-bin/fecdmg?14950022932
ELISE FOR CONGRESS	C00547893	5/23/2014	\$350.00	I360, LLC	SUBSCRIPTIONS	http://docquery.fec.gov/cgi-bin/fecdmg?14950022933
FRIENDS OF DIETZEL	C00545103	2/5/2014	\$650.00	I360	WEB HOSTING FEE	http://docquery.fec.gov/cgi-bin/fecdmg?14960702634
FRIENDS OF DIETZEL	C00545103	3/6/2014	\$350.00	I360	WEB HOSTING FEE	http://docquery.fec.gov/cgi-bin/fecdmg?14960702635
FRIENDS OF DIETZEL	C00545103	4/2/2014	\$350.00	I360	WEB HOSTING FEE	http://docquery.fec.gov/cgi-bin/fecdmg?14950003171
FRIENDS OF DIETZEL	C00545103	5/8/2014	\$350.00	I360	WEB HOSTING FEE	http://docquery.fec.gov/cgi-bin/fecdmg?14950003171
FRIENDS OF DIETZEL	C00545103	6/5/2014	\$350.00	I360	WEB HOSTING FEE	http://docquery.fec.gov/cgi-bin/fecdmg?14950003171
HANDEL FOR SENATE INC	C00545657	3/1/2014	\$1,500.00	I360	MONTHLY DATA SUBSCRIPTION	http://docquery.fec.gov/cgi-bin/fecdmg?14020312873
HURD FOR CONGRESS	C00545467	11/7/2013	\$2,487.51	I360, LLC	DIGITAL CONSULTING	http://docquery.fec.gov/cgi-bin/fecdmg?14940542421
HURD FOR CONGRESS	C00545467	12/8/2013	\$350.00	I360, LLC	DIGITAL CONSULTING	http://docquery.fec.gov/cgi-bin/fecdmg?14940542421
HURD FOR CONGRESS	C00545467	1/14/2014	\$350.00	I360, LLC	DIGITAL CONSULTING	http://docquery.fec.gov/cgi-bin/fecdmg?14940527887
HURD FOR CONGRESS	C00545467	2/7/2014	\$350.00	I360, LLC	DIGITAL CONSULTING	http://docquery.fec.gov/cgi-bin/fecdmg?14940527887

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Republican Candidate Committee Disbursements to i360
2013-14 Election Cycle

Name of Republican Candidate Committee	FEC Committee ID	Date of Disbursement	Amount of Disbursement	Reprint	Reported Purpose of Disbursement	URL to View Disbursement on Committee's Reports Filed with the Commission
HURD FOR CONGRESS	C00545467	3/14/2014	\$350.00	i360, LLC	DIGITAL CONSULTING	http://docquery.fec.gov/cgi-bin/fecimg?14960780776
HURD FOR CONGRESS	C00545467	4/11/2014	\$350.00	i360, LLC	DIGITAL CONSULTING	http://docquery.fec.gov/cgi-bin/fecimg?14960903515
HURD FOR CONGRESS	C00545467	5/9/2014	\$350.00	i360, LLC	RENT & UTILITIES	http://docquery.fec.gov/cgi-bin/fecimg?14960926674
LONEGAN FOR SENATE INC.	C00546044	5/7/2013	\$2,000.00	i360 LLC	LIST ACQUISITION	http://docquery.fec.gov/cgi-bin/fecimg?14960926674
LYNN JENKINS FOR CONGRESS	C00433730	1/21/2013	\$2,575.00	i360, LLC	FUNDRAISING SUBSCRIPTION	http://docquery.fec.gov/cgi-bin/fecimg?14960934914
MATT ROSENDALE FOR MONTANA	C00548289	3/26/2014	\$850.00	i360, LLC	DATA MANAGEMENT	http://docquery.fec.gov/cgi-bin/fecimg?1496093621
MATT ROSENDALE FOR MONTANA	C00548289	4/3/2014	\$350.00	i360, LLC	MONTHLY CANVASSING APP. SUBSCRIPTION	http://docquery.fec.gov/cgi-bin/fecimg?14961254771
MATT ROSENDALE FOR MONTANA	C00548289	5/6/2014	\$350.00	i360, LLC	MONTHLY CANVASSING APP. SUBSCRIPTION	http://docquery.fec.gov/cgi-bin/fecimg?14961254772
MATT ROSENDALE FOR MONTANA	C00548289	5/26/2014	\$350.00	i360, LLC	MONTHLY CANVASSING APP. SUBSCRIPTION	http://docquery.fec.gov/cgi-bin/fecimg?14961254772
MCFADDEN FOR SENATE	C00545821	4/14/2014	\$1,000.00	i360 LLC	WEBSITE MAINTENANCE	http://docquery.fec.gov/cgi-bin/fecimg?14961254772
MCFADDEN FOR SENATE	C00545821	5/7/2014	\$500.00	i360 LLC	SOFTWARE	http://docquery.fec.gov/cgi-bin/fecimg?14961254772
MCFADDEN FOR SENATE	C00545821	7/11/2014	\$500.00	i360 LLC	SOFTWARE	http://docquery.fec.gov/cgi-bin/fecimg?14961254772
MCSALLY FOR CONGRESS	C00512236	5/12/2014	\$1,000.00	i360	ADMINISTRATIVE/SALARY/OVERHEAD: DATABASE	http://docquery.fec.gov/cgi-bin/fecimg?14961635032
MCSALLY FOR CONGRESS	C00512236	8/2/2014	\$1,000.00	i360	ADMINISTRATIVE/SALARY/OVERHEAD: DATABASE	http://docquery.fec.gov/cgi-bin/fecimg?14961635032
MIKE TURNER FOR CONGRESS	C00561738	3/20/2014	\$650.00	i360 LLC	CAMPAIGN CONSULTING / CANVASSING CONSULTING	http://docquery.fec.gov/cgi-bin/fecimg?14961297295
MIKE TURNER FOR CONGRESS	C00561738	4/11/2014	\$350.00	i360 LLC	CANVASSING CONSULTING	http://docquery.fec.gov/cgi-bin/fecimg?14961597276
MIKE TURNER FOR CONGRESS	C00561738	4/14/2014	\$1,199.68	i360 LLC	DATA SUBSCRIPTION	http://docquery.fec.gov/cgi-bin/fecimg?14961597276
MIKE TURNER FOR CONGRESS	C00561738	5/1/2014	\$350.00	i360 LLC	CANVASSING SUBSCRIPTION	http://docquery.fec.gov/cgi-bin/fecimg?14961597277
MIKE TURNER FOR CONGRESS	C00561738	8/24/2014	\$350.00	i360 LLC	CANVASSING CONSULTING	http://docquery.fec.gov/cgi-bin/fecimg?14961808025
ROB WITTMAN FOR CONGRESS	C00441014	4/21/2014	\$1,000.00	i360 LLC	WEBSITE HOSTING	http://docquery.fec.gov/cgi-bin/fecimg?14961274471
ROB WITTMAN FOR CONGRESS	C00441014	5/30/2014	\$500.00	i360 LLC	WEBSITE HOSTING	http://docquery.fec.gov/cgi-bin/fecimg?14961829475
SCHULTZ FOR IOWA	C00556001	3/20/2014	\$750.00	i360	WEBSITE SERVICES	http://docquery.fec.gov/cgi-bin/fecimg?14960721234
SCHULTZ FOR IOWA	C00556001	3/7/2014	\$600.00	i360	ONLINE SERVICES	http://docquery.fec.gov/cgi-bin/fecimg?14961253323
SCHULTZ FOR IOWA	C00556001	6/28/2014	\$350.00	i360	ONLINE SERVICES	http://docquery.fec.gov/cgi-bin/fecimg?14961839244
SCOTT RIGELL FOR CONGRESS	C00483687	8/25/2014	\$1,000.00	i360	IT SERVICES	http://docquery.fec.gov/cgi-bin/fecimg?14961805321
STEVE DAINES FOR MONTANA	C00491357	2/19/2014	\$600.00	i360	DATABASE DEVELOPMENT	http://docquery.fec.gov/cgi-bin/fecimg?14961805321
STEVE DAINES FOR MONTANA	C00491357	3/18/2014	\$300.00	i360	DATABASE DEVELOPMENT	http://docquery.fec.gov/cgi-bin/fecimg?14961805321
STEVE DAINES FOR MONTANA	C00491357	4/16/2014	\$300.00	i360	DATA DEVELOPMENT	http://docquery.fec.gov/cgi-bin/fecimg?14961805321
STEVE DAINES FOR MONTANA	C00491357	8/10/2014	\$300.00	i360	DATABASE DEVELOPMENT	http://docquery.fec.gov/cgi-bin/fecimg?14961805321
SULLIVAN FOR US SENATE	C00551093	4/1/2014	\$850.00	i360, LLC	DATA MANAGEMENT SERVICES	http://docquery.fec.gov/cgi-bin/fecimg?14961805321
SULLIVAN FOR US SENATE	C00551093	7/1/2014	\$350.00	i360, LLC	DATA MANAGEMENT SERVICES	http://docquery.fec.gov/cgi-bin/fecimg?14961805321
SULLIVAN FOR US SENATE	C00551093	7/10/2014	\$350.00	i360, LLC	DATA MANAGEMENT SERVICES	http://docquery.fec.gov/cgi-bin/fecimg?14961805321
TOM REED FOR CONGRESS	C00464032	8/5/2013	\$750.00	i360, LLC	VOTER DATABASE & SET UP FEE	http://docquery.fec.gov/cgi-bin/fecimg?14961805321
TOM REED FOR CONGRESS	C00464032	9/6/2013	\$250.00	i360, LLC	DATA SUBSCRIPTION FEE	http://docquery.fec.gov/cgi-bin/fecimg?14961805321
TOM REED FOR CONGRESS	C00464032	10/1/2013	\$250.00	i360, LLC	SEPT 2013 SUBSCRIPTION	http://docquery.fec.gov/cgi-bin/fecimg?14961805321
TOM REED FOR CONGRESS	C00464032	4/1/2014	\$1,500.00	i360, LLC	6 MONTH SUBSCRIPTION	http://docquery.fec.gov/cgi-bin/fecimg?14961805321
TOM REED FOR CONGRESS	C00464032	6/15/2014	\$500.00	i360, LLC	SUBSCRIPTION	http://docquery.fec.gov/cgi-bin/fecimg?14961805321

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